

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT

PERMITTEE

Trelleborg Sealing Solutions, Inc.  
Attn: Thomas Zobitz  
901 Phoenix Lake Avenue  
Streamwood, Illinois 60107

<u>Application No.:</u> 08010043	<u>I.D. No.:</u> 031306AAR
<u>Applicant's Designation:</u>	<u>Date Received:</u> January 24, 2008
<u>Subject:</u> Polyester Resin Products Manufacturing Plant	
<u>Date Issued:</u>	<u>Expiration Date:</u>
<u>Location:</u> 901 Phoenix Lake Avenue, Streamwood, Cook County, 60107	

This permit is hereby granted to the above-designated Permittee to OPERATE emission source(s) and/or air pollution control equipment consisting of Polyester Resin Products Manufacturing Line comprised of four (4) polystyrene resin application baths, two (2) curing ovens and three (3) curing presses pursuant to the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1a. This federally enforceable state operating permit is issued:
- i. To limit the emissions of air pollutants from the source to less than major source thresholds (i.e., 10 tons/year for any single Hazardous Air Pollutant (HAP) and 25 tons/year for any combination of such HAPs). As a result the source is excluded from the requirement to obtain a Clean Air Act Permit Program (CAAPP) permit. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - ii. To establish federally enforceable production and operating limitations, which restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP) and 25 tons/year of any combination of such HAPs so that the source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWWW.
  - iii. To limit the potential emissions of VOM from the source to less than 25 tons/year. As a result, the source is excluded from the requirement of 35 Ill. Adm. Code Part 205, Emission Reduction Market System. The maximum emissions of this source, as limited by the conditions of this permit, are described in Attachment A.
  - iv. To establish federally enforceable production and operating limitations, which restrict the potential to emit for VOM to less than 25 tons per year so that the source is not subject to the requirements of 35 Ill. Adm. Code Part 218, Subpart PP (Miscellaneous Fabricated Product Manufacturing Processes).

- b. Prior to issuance, a draft of this permit has undergone a public notice and comment period.
  - c. This permit supersedes all operating permit(s) for this location.
- 2a. Pursuant to 35 Ill. Adm. Code 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to 35 Ill. Adm. Code 212.122.
- b. Pursuant to 35 Ill. Adm. Code 212.123(b), the emission of smoke or other particulate matter from any such emission unit may have an opacity greater than 30 percent but not greater than 60 percent for a period or periods aggregating 8 minutes in any 60 minute period provided that such opaque emissions permitted during any 60 minute period shall occur from only one such emission unit located within a 305 m (1000 ft) radius from the center point of any other such emission unit owned or operated by such person, and provided further that such opaque emissions permitted from each such emission unit shall be limited to 3 times in any 24 hour period.
  - c. Pursuant to 35 Ill. Adm. Code 212.301, no person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.
- 3a. Pursuant to 35 Ill. Adm. Code 218.301, no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lbs/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 Ill. Adm. Code 218.302, 218.303, or 218.304 and the following exception: If no odor nuisance exists the limitation of 35 Ill. Adm. Code 218 Subpart G (Use of Organic Material) shall apply only to photochemically reactive material.
- b. The Polyester Resin Products Manufacturing Line is subject to 35 Ill. Adm. Code Part 218, Subpart CC (Polyester Resin Product Manufacturing Process). Pursuant to 35 Ill. Adm. Code 218.666(a), every owner or operator of a polyester resin products manufacturing process subject to 35 Ill. Adm. Code 218 Subpart CC shall comply with the operating requirements below:
    - i. Any of the following:
      - A. Use polyester resin material with a monomer content as follows:
        - I. For polyester resin materials used for products requiring corrosion resistant or fire retardant materials, a monomer content of no more than 48% by weight as applied;

- II. For polyester resin materials for products requiring a tensile strength of 10,000 psi or more, including tooling resins, a monomer content of no more than 48% by weight as applied;
  - III. For clear gel coat, a monomer content of no more than 50% by weight as applied;
  - IV. For other pigmented gel coats, a monomer content of no more than 45% by weight as applied; or
  - V. For all other polyester resin materials, a monomer content shall not exceed 35% by weight as applied; or
- B. Use a closed-mold system or pultrusion system which will result in less than 4% weight loss of polyester resin materials.
- ii. For spraying operations, in addition to the requirements specified in 35 Ill. Adm. Code 218.666(a)(1) above, use only high-volume low pressure (HVLP), airless, air-assisted airless, or electrostatic spray equipment, except for touch-up and repair using a hand-held, air-atomized spray gun which has a container for polyester resin material as part of the gun.
- 4. This permit is issued based upon the source not being subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reinforced Plastic Composites Production, 40 CFR 63 Subpart WWW. This is a result of the federally enforceable production and operating limitations, which have been established in this permit to restrict the potential to emit to less than 10 tons/year for any individual Hazardous Air Pollutant (HAP), and 25 tons/year of any combination of such HAPs.
  - 5. Pursuant to 35 Ill. Adm. Code 212.314, 35 Ill. Adm. Code 212.301 shall not apply and spraying pursuant to 35 Ill. Adm. Code 212.304 through 212.310 and 35 Ill. Adm. Code 212.312 shall not be required when the wind speed is greater than 40.2 km/hr (25 mph). Determination of wind speed for the purposes of this rule shall be by a one-hour average or hourly recorded value at the nearest official station of the U.S. Weather Bureau or by wind speed instruments operated on the site. In cases where the duration of operations subject to this rule is less than one hour, wind speed may be averaged over the duration of the operations on the basis of on-site wind speed instrument measurements.
  - 6. This permit is issued based on the solvent cleaning operations at this source not being subject to 35 Ill. Adm. Code 218.187 (Other Industrial Solvent Cleaning Operations). Pursuant to 35 Ill. Adm. Code 218.187(a)(1), on and after January 1, 2012 except as provided in 35 Ill. Adm. Code 218.187(a)(2), the requirements of 35 Ill. Adm. Code 218.187 shall not apply to all cleaning operations which use organic materials at sources that emit a total of 226.8 kg per calendar month (500 lbs per calendar month) or more of VOM, in the absence of air

pollution control equipment, from cleaning operations at the source other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2). For purposes of 35 Ill. Adm. Code 218.187, "cleaning operation" means the process of cleaning products, product components, tools, equipment, or general work areas during production, repair, maintenance, or servicing, including but not limited to spray gun cleaning, spray booth cleaning, large and small manufactured components cleaning, parts cleaning, equipment cleaning, line cleaning, floor cleaning, and tank cleaning, at sources with emission units.

- 7a. Pursuant to 35 Ill. Adm. Code 212.306, all normal traffic pattern access areas surrounding storage piles specified in 35 Ill. Adm. Code 212.304 and all normal traffic pattern roads and parking facilities which are located on mining or manufacturing property shall be paved or treated with water, oils or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program required by 35 Ill. Adm. Code 212.309, 212.310 and 212.312.
- b. Pursuant to 35 Ill. Adm. Code 212.309(a), the emission units described in 35 Ill. Adm. Code 212.304 through 212.308 and 35 Ill. Adm. Code 212.316 shall be operated under the provisions of an operating program, consistent with the requirements set forth in 35 Ill. Adm. Code 212.310 and 212.312, and prepared by the owner or operator and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions.
- c. Pursuant to 35 Ill. Adm. Code 212.310, as a minimum the operating program shall include the following:
  - i. The name and address of the source;
  - ii. The name and address of the owner or operator responsible for execution of the operating program;
  - iii. A map or diagram of the source showing approximate locations of storage piles, conveyor loading operations, normal traffic pattern access areas surrounding storage piles and all normal traffic patterns within the source;
  - iv. Location of unloading and transporting operations with pollution control equipment;
  - v. A detailed description of the best management practices utilized to achieve compliance with 35 Ill. Adm. Code 212 Subpart K, including an engineering specification of particulate collection equipment, application systems for water, oil, chemicals and dust suppressants utilized and equivalent methods utilized;
  - vi. Estimated frequency of application of dust suppressants by location of materials; and

- vii. Such other information as may be necessary to facilitate the Illinois EPA's review of the operating program.
- d. Pursuant to 35 Ill. Adm. Code 212.312, the operating program shall be amended from time to time by the owner or operator so that the operating program is current. Such amendments shall be consistent with 35 Ill. Adm. Code 212 Subpart K and shall be submitted to the Illinois EPA for its review.
- 8a. Pursuant to 35 Ill. Adm. Code 218.666(b), any owner or operator of a polyester resin products manufacturing process subject to 35 Ill. Adm. Code 218 Subpart CC shall use closed containers for all polyester resin materials, cleaning materials which contain VOM (including waste cleaning materials), and other materials that contain VOM (including waste resin materials) in such a manner as to effectively control VOM emissions to the atmosphere and in accordance with the practices described in the certification pursuant to 35 Ill. Adm. Code 218.670(b)(2)(A).
- b. Pursuant to 35 Ill. Adm. Code 218.666(c), any owner or operator of a polyester resin products manufacturing process subject to 35 Ill. Adm. Code 218 Subpart CC which formulates polyester resin material at the source shall comply with the following operating requirements:
  - i. A cover shall be in place on any tank, vat, or vessel with a capacity greater than 7.5 liters (2 gallons), including a container in which polyester resin materials are delivered to the source, while polyester resin materials are being formulated. The cover shall:
    - A. Completely cover the tank, vat, or vessel opening except for an opening no larger than necessary to allow for safe clearance for a mixer shaft;
    - B. Extend at least 1.27 cm (0.5 inch) beyond the outer rim of the opening or be attached to the rim;
    - C. Remain closed except when adding or removing material or when sampling or inspection procedures require access; and
    - D. Be maintained in good condition such that, when in place, the cover maintains contact with the rim of the opening for at least 90% of the circumference of the rim.
  - ii. Carry out emissions shall be minimized when a mixer used for formulation of polyester resin material is being removed from a tank, vat, or vessel containing polyester resin material by allowing the material retained on the mixer blades to drain back into the tank, vat, or vessel before the mixer is completely removed from the tank, vat, or vessel.
- c. Pursuant to 35 Ill. Adm. Code 218.666(d), any owner or operator of polyester resin products manufacturing processes subject to 35 Ill.

Adm. Code 218 Subpart CC which as a group use more than 4 gallons per day of cleaning materials which contain more than 200 grams of VOM per liter (1.7 pound per gallon) shall use a solvent recovery system for such materials. Solvent recovery may be done at the source or by using an off-site commercial solvent recovery service. The waste residue from a solvent recovery system located at the source shall not contain more than 20% VOM by weight.

9. In the event that the operation of this source results in an odor nuisance, the Permittee shall take appropriate and necessary actions to minimize odors, including but not limited to, changes in raw material or installation of controls, in order to eliminate the odor nuisance.
- 10a. Operation and emissions of the polyester resin product manufacturing line shall not exceed the following limits:

i. Material Usage:

Material	Material Usage	
	ton/month	ton/year
Polyester Resins	12.4	124
Promoter	0.06	0.6
Catalyst	0.13	1.3

ii. VOM Emissions:

Material	Maximum VOM Content (% by Wt.)	Emission Factor (lb/ton)	VOM Emissions	
			(lbs/month)	(ton/year)
Polyester Resins	35	Formula	1,580	7.9
Promoter	35	700	42	0.21
Catalyst	100	2000	260	<u>1.3</u>
			Total:	9.41

iii. HAP Emissions:

Material	Maximum HAP Content (% by Wt.)	Emission Factor (lb/ton)	HAP Emissions	
			(lb/month)	(ton/year)
Polyester Resins	35*	Formula	1,580*	7.9*
Catalyst	10**	2000	260**	0.13**
			Total:	8.03

\* Styrene

\*\* Cumene

- iv. The VOM and HAP emissions shall be calculated from the following formula:

$$E = [\sum(R_i \times EF_s) + \sum(M_j \times C_j)]/2,000$$

Where:

E = VOM/HAP emission (tons);

R<sub>i</sub> = Polyester resin usage (tons);

EF<sub>s</sub> = Styrene emission factor (lbs of styrene/ton of resin);

Where:

EF<sub>s</sub> = (0.184 x S) x 2000 for polyester resin with styrene content less than 33%; or

EF<sub>s</sub> = [(0.2746 x S) - 0.0298] x 2,000 for polyester resin with styrene content equal or more than 33%;

Where:

S = styrene content of the polyester resin (wt. fraction).

M<sub>j</sub> = other VOM-containing material usage (tons); and

C<sub>j</sub> = VOM content of other materials (wt. fraction).

These limits are based on the maximum production rate and styrene emission factors from Table 1 in 40 CFR Part 63, Subpart WWWW - National Emission Standard for Hazardous Air Pollutants for Reinforced Plastic Composites Production for filament application.

- b. This permit is issued based negligible emissions of cobalt from the use of the promoter material. For this purpose, emissions from the use of the promoter material shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year.
- c. Compliance with the annual limits of this permit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).
- 11a. Pursuant to 35 Ill. Adm. Code 201.282, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:
- i. Testing by Owner or Operator. The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be

specified by the Illinois EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. The Illinois EPA may adopt procedures detailing methods of testing and formats for reporting results of testing. Such procedures and revisions thereto, shall not become effective until filed with the Secretary of State, as required by the APA Act. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests.

ii. Testing by the Illinois EPA. The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary.

b. Testing required by Condition 12 shall be performed upon a written request from the Illinois EPA by a qualified independent testing service.

12a. Testing Methods. Pursuant to 35 Ill. Adm. Code 218.668(a):

i. The VOM content of fresh cleaning materials shall be determined from supplier data or by sampling and analysis using EPA Reference Method 24.

ii. The VOM content of waste residue from a solvent recovery system shall be determined by sampling and analysis using EPA Reference Method 24.

iii. The monomer content of polyester resin materials shall be determined:

A. From supplier data and operating data; or

B. By sampling and analysis by the methods set forth in SCAQMD Method 312-91.

iv. The weight loss from polyester resin material in a closed-mold system or pultrusion system during molding shall be determined:

A. From supplier data and operating data;

B. By testing of VOM emissions by the methods set forth in 35 Ill. Adm. Code 218.105; or

C. By material balance as follows: Separately weigh the polyester resin materials and the reinforcement materials before they are introduced into the mold. Weigh the molded



product after it has cooled so that it can be manually handled but no sooner than one hour after removal of the product from the mold. The percent weight loss shall be determined according to the following equation:

$$PWL = \frac{[1 - (C - B)] \times 100}{A}$$

Where,

PWL = Percent Weight Loss;

A = Weight of polyester resin materials;

B = Weight of reinforcement material;

C = Weight of cooled molded product after at least one hour elapsed time.

- v. In the event of a difference between data obtained by sampling and analysis and other data, the data from sampling and analysis shall govern.
- b. Pursuant to 35 Ill. Adm. Code 218.668(b), when in the opinion of the Illinois EPA it is necessary to conduct sampling and analysis to demonstrate compliance with 35 Ill. Adm. Code 218.668, the owner or operator of a polyester resin products manufacturing process subject to the requirements of 35 Ill. Adm. Code 218 Subpart CC shall, at his own expense, conduct such sampling and analysis in accordance with the applicable test methods and procedures specified in 35 Ill. Adm. Code 218.668(a) above. The Illinois EPA's decision to invoke 35 Ill. Adm. Code 218.668(b) may be based on such factors including, but not limited to, a change in operation of the polyester resin products manufacturing process, or a reasonable belief that a previous test resulted in erroneous data.
- 13. Pursuant to 40 CFR 63.10(b)(3), if an owner or operator determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants regulated by any standard established pursuant to section 112(d) or (f) of the Clean Air Act, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to the relevant standard (or other requirement established under 40 CFR Part 63) because of limitations on the source's potential to emit or an exclusion, the owner or operator must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) that demonstrates why the owner or operator believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) must be sufficiently detailed to allow the USEPA and/or Illinois EPA to make a finding about the source's applicability

status with regard to the relevant standard or other requirement. If relevant, the analysis must be performed in accordance with requirements established in relevant subparts of 40 CFR Part 63 for this purpose for particular categories of stationary sources. If relevant, the analysis should be performed in accordance with USEPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Clean Air Act, if any. The requirements to determine applicability of a standard under 40 CFR 63.1(b)(3) and to record the results of that determination under 40 CFR 63.10(b)(3) shall not by themselves create an obligation for the owner or operator to obtain a Title V permit.

- 14a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(B), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187, because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall on and after January 1, 2012, collect and record the following information each month for each cleaning operation, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2):
- i. The name and identification of each VOM-containing cleaning solution as applied in each cleaning operation;
  - ii. The VOM content of each cleaning solution as applied in each cleaning operation;
  - iii. The weight of VOM per volume and the volume of each as-used cleaning solution; and
  - iv. The total monthly VOM emissions from cleaning operations at the source;
- b. Pursuant to 35 Ill. Adm. Code 218.187(e)(10), all records required by this 35 Ill. Adm. Code 218.187(e) shall be retained by the source for at least three years and shall be made available to the Illinois EPA upon request.
- c. Pursuant to 35 Ill. Adm. Code 218.672(a), any owner or operator of a polyester resin products manufacturing process which is subject to the requirements of 35 Ill. Adm. Code 218 Subpart CC shall comply with the following:
- i. On and after a date consistent with 35 Ill. Adm. Code 218.106 or on and after initial start-up date, the owner or operator of a subject process shall collect and record the following information to maintain a complete record of all polyester resin materials which are used by such polyester resin products manufacturing process. This information shall be maintained at the source for a period of three years:
    - A. The name and identification number of each polyester resin material used in the process;

- B. The particular operating requirement with which each polyester resin material will comply, the actual monomer content of the material (percent by weight) and other relevant data to show compliance with the operating requirement, including:
  - I. For each polyester resin material which is classified as a material used for products requiring corrosion resistant or fire retardant materials, a material used for products requiring tensile strength of 10,000 psi or more, or a clear gel coat, justification for such classification if the material is applied to comply with the monomer content limitation of 35 Ill. Adm. Code 218.666(a)(1)(A)(i), (ii), or (iii), respectively; and
  - II. For each polyester resin material which is applied in a closed-mold or pultrusion system so as to comply with 35 Ill. Adm. Code 218.666(a)(1)(B), the weight loss from the polyester resin material (percent by weight) during molding;
- C. A description of the testing which was performed, in accordance with 35 Ill. Adm. Code 218.668, to determine the monomer content of polyester resin materials and the information in 35 Ill. Adm. Code 218.672(a)(1)(C)(ii), (iii) and (iv) and (a)(1)(D) above, including data, calculations, and descriptions and results of the sampling and analysis that the owner or operator has relied upon to show compliance with 35 Ill. Adm. Code 218.666(a)(1);
- D. The processes and applications for which each polyester resin material may be used in compliance with applicable operating requirements, including:
  - I. For each polyester resin material which is classified as a material used for products requiring corrosion resistant or fire retardant material or a material used for products requiring tensile strength of 10,000 psi or more which is applied to comply with the monomer content limitation of 35 Ill. Adm. Code 218.666(a)(1)(A)(i) or (ii), respectively, the required products or circumstances for the materials' use; and
  - II. For each polyester resin material which is applied in a closed-mold or pultrusion system so as to comply with 35 Ill. Adm. Code 218.666(a)(1)(B), the required process temperature and minimum mold cycle time or maximum pultrusion speed;
- E. For each polyester resin material which is applied in a spraying operation, the type of spray equipment with which

the material will be applied so as to comply with 35 Ill. Adm. Code 218.666(a)(2).

- ii. On and after the date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of a subject process shall collect and record all of the following information each day for each process and maintain the information at the source for a period of three years:
  - A. The name, identification number and amount of each polyester resin material applied on each process; and
  - B. The specific data identified pursuant to 35 Ill. Adm. Code 218.672(a)(2)(D) to confirm that the polyester resin material was applied in such a manner that it complied with the applicable operating requirement.
- d. Pursuant to 35 Ill. Adm. Code 218.672(b)(2), any owner or operator of a polyester resin product manufacturing process subject to the requirements of 35 Ill. Adm. Code 218 Subpart CC shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, or on and after the initial start-up date, the owner or operator of the process collect and record all the following information and maintain the information at the source for a period of three years:
  - i. The date, time and duration of scheduled inspections performed to confirm the proper use of closed containers to control VOM emissions, and any instances of improper use of closed containers, with descriptions of actual practice and corrective action taken, if any;
  - ii. Information on a daily basis confirming the proper use of a recovery system if one is required or is used, including operation of a recovery system at the source to produce a waste residue that is 20% or less VOM by weight and information identifying any observation of noncompliance; and
  - iii. Information on a daily basis on the use of cleaning materials which contain more than 200 grams of VOM per liter (1.7 pound per gallon) if a recovery system is not required or is not used. This information shall include the name, identification number, amount used and VOM content of each such cleaning material.
- e. Pursuant to 35 Ill. Adm. Code 218.672(c)(2), any owner or operator of a polyester resin product manufacturing process subject to the requirements of 35 Ill. Adm. Code 218 Subpart CC that formulates polyester resin material at the source shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106 or on and after the initial start-up date, the owner or operator of the process shall collect and record all the following information and maintain the information at the source for a period of three years:

- i. The date, time, and duration of scheduled inspections to confirm the proper use and maintenance of covers on vats, vessels, and tanks and proper drainage of mixers and any instance of improper use, with description of actual practice and corrective action taken, if any;
  - ii. A maintenance log for covers on vats, vessels, and tanks, detailing all routine and non-routine maintenance performed and initial use of new covers, including dates of such activities.
- 15a. The Permittee shall maintain records of the following items so as to demonstrate compliance with the conditions of this permit:
  - i. Polyester resin usage of each type (tons/mo, tons/yr);
  - ii. Styrene content of each type of resin (wt. fraction);
  - iii. Other VOM-containing material usage (tons/mo, tons/yr);
  - iv. VOM and HAP content of other materials (wt. fraction); and
  - v. Monthly and annual VOM and HAP emissions from the source with supporting calculations (tons/mo, tons/yr).
- b. All records and logs required by this permit shall be retained at a readily accessible location at the source for at least five (5) years from the date of entry and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request. Any records retained in an electronic format (e.g., computer storage device) shall be capable of being retrieved and printed on paper during normal source office hours so as to be able to respond to an Illinois EPA or USEPA request for records during the course of a source inspection.
- 16a. Pursuant to 35 Ill. Adm. Code 218.187(e)(1)(C), the owner or operator of a source exempt from the limitations of 35 Ill. Adm. Code 218.187 because of the criteria in 35 Ill. Adm. Code 218.187(a)(1) shall comply with the following: Notify the Illinois EPA of any record that shows that the combined emissions of VOM from cleaning operations at the source, other than cleaning operations identified in 35 Ill. Adm. Code 218.187(a)(2), ever equal or exceed 226.8 kg/month (500 lbs/month), in the absence of air pollution control equipment, within 30 days after the event occurs.
- b. Pursuant to 35 Ill. Adm. Code 218.672(a)(4), any owner or operator of a polyester resin products manufacturing process which is subject to the requirements of 35 Ill. Adm. Code Subpart CC shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject process shall notify the Illinois EPA:
  - i. Of any violation of the operating requirements of 35 Ill. Adm. Code 218 Subpart CC by sending a copy of such record to the

Illinois EPA within 30 days following the occurrence of the violation; and

- ii. At least 30 calendar days before changing the method of compliance with 35 Ill. Adm. Code 218 Subpart CC from one operating requirement among 35 Ill. Adm. Code 218.666(a)(1)(A), (B), (C), or (D) to another operating requirement, of compliance with all requirements of 35 Ill. Adm. Code 218.672(a)(1). Upon changing the method of compliance with 35 Ill. Adm. Code 218 Subpart CC from one operating requirement to another, the owner or operator shall comply with all applicable requirements of 35 Ill. Adm. Code 218.672(a).
- c. Pursuant to 35 Ill. Adm. Code 218.672(b)(3), any owner or operator of a polyester resin product manufacturing process subject to the requirements of 35 Ill. Adm. Code 218 Subpart CC shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject process shall notify the Illinois EPA:
- i. Of a violation of the requirements of 35 Ill. Adm. Code 218 Subpart CC with respect to handling practices and solvent recovery for cleaning materials by sending a copy of all such records to the Illinois EPA within 30 days following the calendar quarter in which such violation occurred; or
  - ii. Within 30 calendar days of changing the handling practices for polyester resin materials, cleaning materials and waste materials or changing source practice with respect to a solvent recovery system for cleaning materials, describing the change.
- d. Pursuant to 35 Ill. Adm. Code 218.672(c)(3), any owner or operator of a polyester resin product manufacturing process subject to the requirements of 35 Ill. Adm. Code 218 Subpart CC that formulates polyester resin material at the source shall comply with the following: On and after a date consistent with 35 Ill. Adm. Code 218.106, the owner or operator of a subject process shall notify the Illinois EPA:
- i. Of a violation of the requirements of 35 Ill. Adm. Code 218 Subpart CC with respect to formulation of polyester resin material by sending a copy of all such records to the Illinois EPA within 30 days following the calendar quarter in which such violation occurred; or
  - ii. Within 30 calendar days of changing the handling practices for formulation of polyester resin materials, describing the change.
- e. Pursuant to 35 Ill. Adm. Code 218.990, upon request by the Illinois EPA, the owner or operator of an emission unit which is exempt from the requirements of 35 Ill. Adm. Code 218 Subparts PP, QQ, RR, TT or 35 Ill. Adm. Code 218.208(b) shall submit records to the Illinois EPA

within 30 calendar days from the date of the request that document that the emission unit is exempt from those requirements.

17a. If there is an exceedance of or a deviation from the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance or deviation. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or deviation and efforts to reduce emissions and future occurrences.

b. Two (2) copies of required reports and notifications shall be sent to:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
Compliance Section (#40)  
P.O. Box 19276  
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency  
Division of Air Pollution Control  
9511 West Harrison  
Des Plaines, Illinois 60016

If you have any questions on this permit, please call Valeriy Brodsky at 217/785-1705.

Raymond E. Pilapil  
Manager, Permit Section  
Division of Air Pollution Control

Date Signed: \_\_\_\_\_

REP:VJB:

cc: Illinois EPA, FOS Region 1  
Lotus Notes

Attachment A - Emissions Summary

This attachment provides a summary of the maximum emissions from the Polyester Resin Products Manufacturing Plant operating in compliance with the requirements of this federally enforceable permit. In preparing this summary, the Illinois EPA used the annual operating scenario which results in maximum emissions from such a plant. The resulting maximum emissions are below the level (i.e., 10 tons per year for any single HAP and 25 tons per year for any combination of such HAP), at which this source would be considered a major source for purposes of the Clean Air Act Program Permit (CAAPP). Actual emissions from this source will be less than predicted in this summary to the extent that the quantity of material processed by the source and control measures used are more effective than that required in this permit.

<u>Emission Unit</u>	E M I S S I O N S (Tons/Year)		
	<u>VOM</u>	Single <u>HAP</u>	Combined <u>HAPs</u>
Polyester Resin Products Manufacturing Line	9.41	7.9*	8.47

\* Styrene

REP:VJB: